## Visiology, Inc.

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#### Via Electronic Filing

February 6, 2006

Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Certification of CPNI Filing (February 6, 2006)

**Cooperative Communications, Inc.** 

EB-06-TC-060

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's Rules, Cooperative Communications, Inc. hereby submits their certification and statement in accordance with the Commission's Public Notice, dated January 30, 2006 (DA 06-223).

Please date stamp the duplicate copy of this filing and return in the enclosed envelope as proof of filing. Any questions regarding this matter should be directed to me at (205) 330-1703 or via email to bobbi@visiology.com. Your assistance in this matter is greatly appreciated.

Yours truly,

Bobbi Ferguson

Bobbi Ferguson
Consultant for
Cooperative Communications, Inc.

Attachments

cc: Byron McCoy, TCD, Enforcement Bureau

Best Copy and Printing

### **CERTIFICATION**

I certify that I have personal knowledge that Cooperative Communications,	Inc.	has
established operating procedures, has complied with these procedures, and	they	are
adequate to ensure compliance with Federal laws and regulations.		

SIGNATURE	DATE
PRINTED NAME	POSITION

# COOPERATIVE COMMUNICATIONS, INC. CPNI OPERATING PROCEDURES FOR ENSURING COMPLIANCE WITH 47 U.S.C. § 222 and 47 C.F.R. §§ 64.2005, 2007- 2009

Every telecommunications carrier has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunication carriers, equipment manufacturers, and customers, including telecommunication carriers reselling telecommunications services provided by a telecommunications carrier.

#### CONFIDENTIALITY OF CARRIER INFORMATION

A telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for its own marketing efforts..

#### **COMPANY SERVICES PROVISION**

Cooperative Communications, Inc. ("the Company") is a local exchange, an interexchange long distance, and information service provider. The Company has no joint-venture partners.

#### **CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory.

#### **MARKETING PROCEDURES**

The Company markets its services solely through direct sales.

#### UTILIZATION OF CPNI

- (1) The Company obtains and utilizes CPNI solely for the purpose of providing local exchange, interexchange and information services to its customers, billing its customers for its services, collecting payment for its services, and maintenance and repair of services. Where necessary, the Company may use, disclose or permit access to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.
- The Company uses, discloses, or permits access to CPNI to provide or market service offerings among the categories of service to which the Customer already subscribes. The Company uses, discloses, or permits access to CPNI derived from the provision of its local exchange or interexchange services for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval.
- (3) The Company does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers or for any other purpose that is prohibited by the FCC's rules.
- (4) Without Customer approval, the Company does not use, disclose or permit access to CPNI to provide or market service offerings within a category of service that the Customer does not already subscribe, except that the Company uses, discloses or permits access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; and (b) market, when we provide local service, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

#### **CPNI DISCLOSURE TO THIRD-PARTIES**

The Company does not disclose CPNI of its current or former customers to any thirdparty except as required by law or regulation, or under confidentiality agreements in accordance with FCC rules, or upon customer request.